

IN THE UNITED STATES COURT OF FEDERAL CLAIMS
Bid Protest

CENTERLINE LOGISTICS CORP.,

Plaintiff,

v.

UNITED STATES OF AMERICA,

Defendant.

Case No.: 20-483 C

Assigned to: _____

PLAINTIFF CENTERLINE LOGISTICS CORP.'S
MOTION FOR LEAVE TO FILE UNDER SEAL

Pursuant to Rule 4 of Appendix C to the Rules of the United States Court of Federal Claims (“RCFC”), Plaintiff Centerline Logistics Corp. (“Centerline”), by and through its undersigned counsel, hereby moves for leave to file its Complaint and related filings, including its Motion for Temporary Restraining Order and for Preliminary Injunction, under seal. Both solicitations at issue in this case were protested to the Government Accountability Office (“GAO”), and certain information is subject to the GAO’s protective order. In addition, the issues in the case may further implicate sensitive competitive information, including information about the current procurement.

From Centerline’s review, only Appendix Exhibits 9-11, 21-22, and 25 need to be maintained under seal, as they contain competition-sensitive information, the disclosure of which would prejudice Harley in the ongoing procurement and elsewhere. Centerline is submitting a proposed redacted version of its Appendix herewith.

Centerline has filed the remaining documents under seal out of an abundance of caution to enable any other party to request that additional materials be sealed or redacted. Centerline requests that the Court unseal its submissions, other than the confidential version of its Appendix, if no party responds to this motion or otherwise requests sealing.

WHEREFORE, Plaintiff Centerline respectfully requests that the Court grant its motion.

Dated: April 21, 2020

Respectfully submitted,

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Attorneys for Centerline Logistics Corp.

CERTIFICATE OF SERVICE

I hereby certify that on April 21, 2020, the foregoing motion was electronically filed using the Court's CM/ECF system, and was further sent by electronic mail to the following:

U.S. Department of Justice
Commercial Litigation Branch
1100 L Street, NW, 8th Floor
Washington, DC 20530
nationalcourts.bidprotest@usdoj.gov

/s/ Bryant E. Gardner

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